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USWEST

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March 9, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 - 12th Street, SW, Room TW-A325
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: CC Docket No. 99-200 Number Resource Optimization

Dear Ms. Salas:

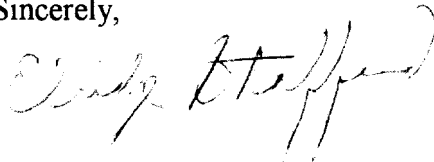
Yesterday, the undersigned met with Peter Tenhula and Michelle Cotter of Commissioner Powell's office. Stephanie Boyett-Colgan, U S WEST Wireless, LLC, and Mike Whaley, U S WEST Communications, participated in this meeting via teleconference bridge. The purpose of the meeting was to discuss U S WEST's position on the issues being addressed in the above-referenced proceeding. Attached is a copy of the outline covering the points discussed.

In accordance with Section 1.1206(b)(2) of the Commission's rules, the original and one copy of this letter, with attachment, are being filed with your office for inclusion in the record of this proceeding.

Acknowledgment and date of receipt of this submission are requested. A duplicate of this letter is attached for this purpose.

Please contact me should you have any questions concerning this matter.

Sincerely,



Attachment

cc: Mr. Peter Tenhula
Ms. Michelle Cotter

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List ABCDE

U S WEST
Number Resource Optimization
CC Docket No. 99-200

Presented by:
Stephanie Boyett-Colgan
Elridge Stafford
Mike Whaley

March 8, 2000

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Utilization

- The FCC should establish a minimum utilization threshold to measure optimization of numbering resources
 - Carriers who meet the threshold should not be required to pool their resources.
- Uniform reporting is needed for evaluating efficiency of resources allocated
 - Standard nationwide categories should apply to all carriers,
 - The length of time a number ages should be uniform across all carriers.
- Authorize, and direct, the NANPA to conduct random and for-cause audits.

Thousand Block Pooling

- U S WEST supports deployment of thousand block number pooling only where there is value
 - Exhaust is projected to be 12 or more months away,
 - NPA life can be extended by 2 or more years.
- Pooling has value for new NPAs in major metro areas.
 - Pooling does not help NPAs that are in jeopardy.
- Thousand block pooling needs uniform national set of guidelines and uniform method for all carriers to use.
- Pooling implementation should be on a phased or staggered schedule.
- Pooling should not be implemented until NPAC Release 3.0 is available.
 - Upgrading from current release (1.4) to 3.0 would occur within a year, increasing the probability of errors and adding additional cost.
 - The national and regional Limited Liability Companies (LLCs) have voted to adopt NPAC release 3.0.
- Pooling should not be required for non-LNP capable carriers.

Cost Recovery

- Cost Recovery should be determined concurrent with Number Pooling order.
- Cost Recovery should be via an end user charge; large non-recurring expenditures,
 - Benefit is to all customers through number conservation,
 - Ongoing operations and maintenance costs become infrastructure.
- Or, treat as an exogenous change under price cap rules

- A regulatory mandate,
- Extraordinary cost,
- Requires a separations change.
- Options to recover exogenous cost:
 - New charge on per line basis to interstate customers,
 - New charge on an MOU basis to interstate customers,
 - Spread as a normal exogenous cost in a cost causative manner to all services (i.e., no unique charge).

Uniform Dialing Plan

- NANC is reviewing the plan – FCC should endorse 10 digit dialing
 - It is pro-competitive,
 - Creates equal footing for all carriers,
 - Avoids customer confusion that continues to arise when some 7 digit dialing remains.
- Technology specific overlays should not be permitted.

UNP – Unassigned Number Porting

- U S WEST supports the FCC's decision to not authorize UNP.
 - UNP lacks usefulness in conserving numbers.
 - Proponents of UNP cannot support their assertions.
 - UNP would encourage and permit the contamination of thousands blocks.
 - Under UNP, managing exhaust of a service providers assigned resources will become cumbersome and overly complex.
 - UNP is not thought out, no requirements or standards have been developed.
 - 911 concerns have not been examined or addressed.

Other Issues

- The FCC should closely monitor state numbering decisions and area code relief activities. Further delegation should be avoided.
- NANPA should be directed to advise the FCC of non-compliance with the guidelines.
- FCC must hold each carrier accountable for its number utilization efficiency and should direct that there be audits of all carriers.